

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF ALABAMA

IN RE:) CHAPTER 13
SHEILA NEWMAN)
THOMAS NEWMAN) CASE NO. 16-32094-DHW-13
Debtor(s).)

OBJECTION TO CONFIRMATION

Now comes WORLD OMNI FINANCIAL CORP., by its attorneys, Chambless Math ❖
Carr, P.C., and objects to confirmation of the Debtor's proposed plan and in support thereof
states as follows:

1. This creditor has filed a claim in the amount of \$20,694.29 which is secured by one
2013 TOYOTA PRIUS.

2. The collateral securing the debts of the creditor is grossly undervalued and/or the
specified monthly payment is insufficient to provide this creditor with adequate protection
against depreciation of its interest over the term of the plan. The plan proposes to value the
collateral at \$13,050.00 whereas the NADA retail value is \$18,450.00.

3. The plan is not feasible. The specified payment for this Creditor is insufficient to pay
the secured claim of this creditor over the term of the plan. The plan fails to meet the
requirements of 11 U.S.C. Section 1325(a)(6).

4. The plan fails to provide an appropriate adequate protection payment amount. The
plan proposes to pay \$131.00 per month as adequate protection. An appropriate adequate
protection payment amount is \$184.50 or 1% of the value of the collateral.

WHEREFORE, WORLD OMNI FINANCIAL CORP., prays for an Order denying
confirmation along with such further relief as the Court may deem proper.

WORLD OMNI FINANCIAL CORP.

By: /s/ Leonard N. Math

Of Counsel:

Chambless Math ❖ Carr, P.C.

P.O. Box 230759

Montgomery, Alabama 36123-0759

(334) 272-2230

lmath@chambless-math.com

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served on all attorneys of record as set forth below by electronic notice and/or depositing a copy thereof in the United States mail postage prepaid on this September 9, 2016.

SABRINA L. MCKINNEY
Chapter 13 Trustee
P.O. BOX 173
MONTGOMERY AL 36101

RICHARD D SHINBAUM
SHINBAUM & CAMPBELL
P.O. BOX 201
MONTGOMERY AL 36101

SHEILA NEWMAN
THOMAS NEWMAN
160 STONEPARK BLVD APT 1606
PIKE ROAD AL 36064

/s/ Leonard N. Math